

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
WESTERN DIVISION

FILED
AUG 21 2018
Matthew Thibault
CLERK

UNITED STATES OF AMERICA,

CR *18-50091*

Plaintiff,

REDACTED INDICTMENT

v.

Attempted Commercial Sex
Trafficking of Children
(18 U.S.C. §§ 1591(a)(1), 1591(b)(2),
and 1594(a))

ZAM LIAN MUNG,

Attempted Enticement of a Minor
Using the Internet
(18 U.S.C. § 2422(b))

Defendant.

The Grand Jury charges:

COUNT I

On or about August 7, 2018, in the District of South Dakota, in and affecting interstate commerce, the defendant, Zam Lian Mung, did knowingly attempt to recruit, entice, obtain, patronize, and solicit a person who had attained the age of 14 years, but had not attained the age of 18 years, knowing and in reckless disregard that the person was a minor and would be caused to engage in a commercial sex act, all in violation of 18 U.S.C. §§ 1591(a)(1), 1591(b)(2), and 1594(a).

COUNT II

On or about August 7, 2018, in the District of South Dakota, the defendant, Zam Liam Mung, did use a facility and means of interstate commerce, that is, a cellular phone and computer attached to the internet, to attempt to

knowingly persuade, induce, entice, and coerce an individual who had not yet attained 18 years of age to engage in sexual activity for which the defendant, Zam Liam Mung, could be charged with a criminal offense and criminal offenses, namely, rape in the fourth degree, in violation of South Dakota Codified Law § 22-22-1(5), and felony sexual contact with a child under sixteen, in violation of South Dakota Codified Law §§ 22-22-7 and 22-22-7.1, all in violation of 18 U.S.C. § 2422(b).

A TRUE BILL:

Name Redacted

Foreperson

RONALD A. PARSONS, JR.
UNITED STATES ATTORNEY

By: 